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4 *Attorneys for Counterdefendant Beehive Insurance*
Agency, Inc.

5
6 UNITED STATES DISTRICT COURT
7 DISTRICT OF NEVADA

8 THE CINCINNATI SPECIALTY
UNDERWRITERS INSURANCE
9 COMPANY,

CASE NO: 3:20-cv-0272-MMD-BNW

10 Plaintiff,

11 vs.

12 RED ROCK HOUNDS, a Domestic
Nonprofit Corporation Without Stock
13 (81) [sic]; LYNN LLOYD, individually,
and TRACY TURNBOW (Interested
14 Party),

15 Defendants.

16 RESPONSE TO ALTERNATIVE
MOTION TO STAY PROCEEDINGS

17 RED ROCK HOUNDS, a Domestic
Nonprofit Corporative Corporation
Without Stock; and BARBARA LYNN
18 LLOYD,

19 Counterclaimants,

20 vs.

21 THE CINCINNATI SPECIALTY
UNDERWRITERS INSURANCE
22 COMPANY; BEEHIVE INSURANCE
AGENCY, INC., a Utah corporation,
23 doing business as CERTIFIED INSURANCE
SERVICES, INC.,

24 Counterdefendant.

25 BEEHIVE INSURANCE AGENCY, INC.,
26 a Utah corporation,

27 Third-Party Plaintiff,

28 vs.

1 MOORE, CLEMENS & CO., INC.,
 2 a Virginia corporation, and DOES
 I-X, inclusive,

3 Third-Party Defendants.
 4 _____/

5 Counterdefendant/Third-Party Plaintiff, BEEHIVE INSURANCE AGENCY, INC.,
 6 (“BEEHIVE”), by and through its counsel of record, ERICKSON, THORPE & SWAINSTON,
 7 LTD., and JOHN C. BOYDEN, ESQ., and hereby provides this Response to the Alternative Motion
 8 to Stay [ECF #15].

9 BEEHIVE takes no formal position on the Alternative Motion to Stay, other than to note that
 10 if the Court grants said Motion, that BEEHIVE be permitted to attend relevant depositions in the
 11 underlying State Court action. It could jeopardize and prejudice BEEHIVE if certain topics were
 12 discussed in the State Court action that involve the insurance issues at play in this Federal Court
 13 lawsuit.

14 For this reason, if the Court grants the pending Alternative Motion to Stay, it is respectfully
 15 requested that BEEHIVE be permitted to attend relevant depositions. This would also apply to the
 16 Third-Party Defendant, Moore Clemens, who has yet to make an appearance, but presumably would
 17 also want to attend such depositions. It should also be mentioned that if the Court does not grant the
 18 Alternative Motion to Stay, it makes sense from an efficiency standpoint for the involved counsel
 19 to coordinate with each other on both the state and federal cases so as to avoid duplicate and
 20 unnecessary litigation expenses.

21 **Affirmation**

22 The undersigned does hereby affirm that the preceding document does not contain the social
 23 security number of any person.

24 DATED this _____ day of August, 2020.

25 ERICKSON, THORPE & SWAINSTON, LTD.

26 BY: /s/ JOHN C. BOYDEN
 27 JOHN C. BOYDEN, ESQ.
 Attorneys for Counterdefendant/
 28 Third-Party Plaintiff
Beehive Insurance Agency, Inc.

CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), I certify that I am an employee of ERICKSON, THORPE & SWAINSTON, LTD., and that on this day I served a true and correct copy of the attached document by:

- ☐ U.S. Mail
☐ Facsimile Transmission
☐ Personal Service
☐ Messenger Service
☒ CM/ECF (electronic filing)
☐ E-Mail Service

addressed to the following:

NAME & ADDRESS	PHONE/FAX NUMBERS	PARTY
Curtis B. Coulter, Esq. Coulter Harsh Law 403 Hill Street Reno, NV 89501	775-324-3380 775-324-3381	Plaintiff
Griffith H. Hayes, Esq. Daniel B. Cantor, Esq. Litchfield Cavo LLP 3993 Howard Hughes Pkwy, #100 Las Vegas, NV 89169 Hayes@litchfieldcavo.com Cantor@litchfieldcavo.com	702-949-3100 702-916-1776	Plaintiff
Richard G. Hill, Esq. Richard G. Hill, Ltd. 652 Forest Street Reno, NV 89509 rhill@richardhilllaw.com	775-348-0888	Red Rock Hounds and Barbara Lynn Lloyd

DATED this 17 day of August, 2020.


